

**Northeast National Petroleum Reserve – Alaska
Draft Amended Integrated Activity Plan/
Environmental Impact Statement**

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Observer of US methods for creating and resolving environmental problems.

Summary

1

It is with reluctance that I would support Alternative B. The reluctance stems from a feeling that a policy for accepting Alternative C would signal a political disregard for environmental concerns and that Alternative A is probably a dead duck in the current climate, if I am allowed to use the word 'climate'. The putting forward of Alternative A would create such a backlash from industry that the result could not only be the forced acceptance of Alternative C but also the opening up for extraction in the Arctic National Wildlife Refuge.

2

My preferred options, which would involve a change in central policy (which is beyond the remit of BLM) are as follows:

- a) Energy consumption is reigned in by using economic measures equally spread across all relevant areas.
- b) Only when the policy for conservation of energy is reaching the buffers, would the National Petroleum Reserve be opened for exploration and extraction and only on the basis that plans such as Alternative B be adopted in consideration that ANWR will never be opened.

3

I recognise that whereas the NPR-A was set aside principally as a reserve for oil, ANWR has been set aside as a refuge and nothing can justify the betrayal of opening that area up for exploitation.

Climate Change

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It has been a slow process but it is dawning on the United States that climate change is possibly the greatest threat facing all species on this planet.

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Making more oil available rather than making it less economic to use sends out the wrong message. The oil industry has a vested interest in finding more reserves but they represent a very small part of industry as a whole. A balance needs to be struck and so Alternative B, as a last resort, does provide a modicum of balance.

6

The US, as the greatest consumer of energy needs to do much more to stabilize demand let alone reduce it. It needs leadership and long term planning, both sadly lacking at the top.

Climate change at a local level is going to affect the area under question. In 1995 the EPA published papers suggesting that the sea level will rise due to global warming by about 12 inches a century. The Department for the Environment, Food and Rural Affairs in London, this June has revised its figures to an increase of about 18 inches per century. Much of the area around Teshekpuk Lake is, I am told, no more than ten feet above sea level.

8

Add to this the warming effects on air circulation, the possibility of the permafrost melting permanently and I can foresee the extraction industry emulating the industries of the Mississippi Basin area and demanding that the tax payer protect industry's investments with the construction of levees, drainage and hard roads, all at public expense.

Production Figures.

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Geologists in the oil industry generally accept that there is enough oil around the world for at least the next 40 years. This in spite of Shell reducing its recoverable reserves figures just about every other week.

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The current problem is one of production and processing. With China and other developing countries consuming more and more energy, the bottleneck is at the production platform and at the refinery stage. Opening the NE NPR-A with its 2 billion barrels is not going to make a significant difference, not enough perhaps to justify opening it all. If the US currently consumes 7bn barrels a year and the life of the new field is, say, 20 years, then production per annum would equal one day's national consumption at current figures.

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National security and strategic considerations are often quoted as a good reason for opening up fields inside the US. The consumption figures are so high that conservation is the only step that is going to make any sense.

Poachers and Gamekeepers

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Laws are only as good as their observance and their monitoring. The writer has no experience of either the BLM or of the State of Alaska, but observations elsewhere raise a feeling of disquiet. The political appointee system, the funding system for politicians and a heavy reliance on self monitoring do not give confidence. To my British eyes it is an odd system and so regulation is like the curate's egg – good in parts. To throw off the tyranny of King George is one thing, but to open the door to tyranny of another nature is foolhardy.

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